

AO 91 (Rev. 11/11) Criminal Complaint

United States District Court  
Southern District of Texas  
FILED

## UNITED STATES DISTRICT COURT

NOV 05 2019

for the

Southern District of Texas

David J. Bradley, Clerk

United States of America )

v. )

Juan Carlos RAMIREZ-Sanchez )

COB: Mexico )

YOB: 1992 )

Case No. M-19-2711-M

Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of November 4, 2019 in the county of Hidalgo in the  
Southern District of Texas, the defendant(s) violated:

## Code Section

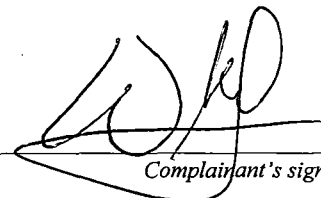
18 USC 922(g)(5)(A)

## Offense Description

It shall be unlawful for any person, who, being an alien, is illegally or unlawfully present in the United States to ship or transport in interstate or foreign commerce, or possess in or affecting commerce, any firearm or ammunition; or to receive any firearm or ammunition which has been shipped or transported in interstate or foreign commerce, to wit: 100 rounds of .38 caliber ammunition, in violation of Title 18 United States Code Section 922(g)(5)(A).

This criminal complaint is based on these facts:

See ATTACHMENT "A"

☒ Continued on the attached sheet.Approved AUSA Claire Nguyen  
11/5/19 8:10 A.M.

Complainant's signature

William A. Hartley, HSI Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date:

11/5/2019

City and state:

McAllen, Texas

Judge's signature

U.S. Magistrate Judge J. Scott Hacker

Printed name and title

### ATTACHMENT "A"

On November 4, 2019, at approximately 5:25 p.m., a Texas Department of Public Safety (DPS) Trooper conducted a vehicle stop on a beige Chevrolet sedan bearing Tamaulipas, Mexico License Plates XFY-512-A for making too wide of a left-hand turn (turning into the outside lane instead of the inside lane) at a traffic light intersection, and for failing to signal a lane change.

The Texas DPS Trooper proceeded to make contact with the driver, later identified as Juan Carlos RAMIREZ-Sanchez (hereafter referred to as "RAMIREZ"), and upon doing so, RAMIREZ provided only government of Mexico issued identification documents.

The Texas DPS Trooper observed RAMIREZ showing signs of nervousness, at which time the Trooper asked RAMIREZ if he could search his vehicle. RAMIREZ granted the Trooper permission to search his vehicle, and a short time thereafter, the Trooper located two boxes of .38 caliber ammunition, both containing 50 rounds of ammunition, for a total of 100 rounds of ammunition in the center console of the vehicle.

Special Agent William A. Hartley of Homeland Security Investigations (HSI) Assistant Special Agent in Charge (ASAC) McAllen, Texas office and a Texas DPS Criminal Investigations Division (CID) Special Agent proceeded to the location of the vehicle stop.

Upon arriving, Special Agent Hartley conducted an immigration inspection of RAMIREZ, at which time it was determined that RAMIREZ was an alien illegally present in the United States, without any documents or documentation to be in or remain in the United States legally.

At this time, RAMIREZ was placed under arrest for being an illegal alien in possession of ammunition, in violation of Title 18 United States Code Section 922(g)(5)(A).